

UNITED STATES BANKRUPTCY COURT

FOR THE

**EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

In the Matter of:

STACY LYNN PHILLIPS

Debtor

Chapter 13

Case No. 21-10085-KHK

AMENDED OBJECTION TO CONFIRMATION OF PLAN

Thomas P. Gorman, Chapter 13 Trustee, has filed this amended objection to confirmation of your Chapter 13 Plan filed January 21, 2021. The cause for this additional objection is as follows:

Violation of 11 U.S.C. §1325(a)(6) and 11 U.S.C. 1325(a)(3) – Feasibility and Good Faith.

- Section 4B of Plan proposes to surrender collateral twice described as a “timeshare” to Service Finance Company. Service Finance Co., LLC has filed unsecured Proof of Claim #9-1 for that debt, and the supporting documents describe the collateral as “WINDOWS/DOORS” (Pg. 5). Accordingly, the creditor secured by the “Sheraton Flex Vacation Plan Timeshare” has not been given notice of the Debtor’s intent to surrender.

Date: March 17, 2021

/s/Thomas P. Gorman
Thomas P. Gorman
Chapter 13 Trustee
300 N. Washington Street, #400
Alexandria, VA 22314
(703) 836-2226
VSB 26421

Amended Objection To Confirmation

Stacy Lynn Phillips, Case # 21-10085-KHK

CERTIFICATE OF SERVICE

I hereby certify that I have this 17th day of March, 2021, served via ECF to authorized users or mailed a true copy of the foregoing Amended Objection to Confirmation to the following parties.

Stacy Lynn Phillips
Chapter 13 Debtor
5267 Quebec Place
Woodbridge, VA 22193

Martin C. Conway
Attorney for Debtor
Conway Law Group, PC
12934 Harbor Drive, Suite 107
Woodbridge, VA 22192

_____/s/ Thomas P. Gorman_____
Thomas P. Gorman